

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:) CHAPTER 13
VAUGHNETTE MICHELLE JONES,)
) CASE NO. 24-50770-PWB
Debtor.)

**NOTICE OF OBJECTION TO THE PROOF OF CLAIM OF
US DEPARTMENT OF EDUCATION/MOHELA (CLAIM NO. 11), DEADLINE TO
OBJECT AND HEARING**

VAUGHNETTE MICHELLE JONES has filed an Objection to the Proof of Claim of US Department of Education/MOHELA, Claim No. 11, on September 29, 2025. Pursuant to Fourth Amended and Restated General Order No. 24-2018, the Court may consider this matter without further notice or a hearing if no party in interest files a response or objection within thirty (30) days from the date of service of this notice. **If you object to the relief requested in this pleading, you must timely file your objection with the Bankruptcy Clerk at If you object to the relief requested in this pleading, you must timely file your objection with the Bankruptcy Clerk** at Clerk, U.S. Bankruptcy Court, Suite 1340, 75 Ted Turner Drive, SW, Atlanta, Georgia 30303 and serve a copy on the Debtor's attorney, Burrow & Associates, LLC, 2280 Satellite Blvd., Bldg. A, Suite 100, Duluth, Georgia 30097, and any other appropriate persons by the objection deadline. The response or objection must explain your position and be actually received by the Bankruptcy Court within the required time.

A hearing on the pleading has been scheduled for November 5, 2025. The Court will hold a hearing on the Objection to the Proof of Claim of US Department of Education/MOHELA, Claim No. 11, at 10:00 A.M. on November 5, 2025, in Courtroom 1401, United States Courthouse, 75 Ted Turner Drive, SW, Atlanta Georgia 30303, which must be attended in person, unless the Court orders otherwise.

If an objection or response is timely filed and served, the hearing will proceed as scheduled. **If you do not file a response or objection within the time permitted, the Court may grant the relief requested without further notice and without holding the scheduled hearing** provided that an order approving the relief requested is entered at least one business day prior to the scheduled hearing. If no objection is timely filed, but no order is entered granting the relief is requested at least one business day prior to the scheduled hearing, the hearing will be held as scheduled.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

Dated this 29th day of September, 2025.

Respectfully Submitted by,
BURROW & ASSOCIATES, LLC

/s/

Kevin Grindlay
Attorney for the Debtor
Georgia Bar No. 350009
2280 Satellite Blvd.
Bldg. A, Suite 100
Duluth, Georgia 30097
(678) 942-8640
bankruptcy@legalatlanta.com

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:)	CHAPTER 13
VAUGHNETTE MICHELLE JONES,)	
)	CASE NO. 24-50770-PWB
Debtor.)	

**DEBTOR’S OBJECTION TO THE PROOF OF CLAIM OF
US DEPARTMENT OF EDUCATION/MOHELA (CLAIM NO. 11)**

COMES NOW, Vaughnette Michelle Jones, Debtor, by and through the attorney of record, and objects to the claim of US Department of Education/MOHELA (“Creditor”), Claim No. 11, and shows the Court the following:

1.

Debtor filed this voluntary petition for relief as a Chapter 13 on January 23, 2024 and same is assigned case number 24-50770.

2.

US Department of Education/MOHELA filed a secured claim, Claim No. 11, in the amount of \$30,674.81 on June 28, 2024.

3.

Debtor objects to the payment of said claim of US Department of Education/MOHELA on the basis that Debtor was a parent borrower whose son (the student) passed away in 2024. On page 14 (Section 19) of the Master Promissory Note that Creditor included in their proof of claim, it states that a parent borrower’s student loan debt will be discharged if the child student passes away. A copy of the death certificate is attached as “Exhibit A.”

WHEREFORE, the Debtor respectfully prays:

- a. That Debtor be granted a Hearing on Debtor's objection to the claim of US Department of Education/MOHELA;
- b. That said claim be DISALLOWED; and

- c. That the Debtor has such other and further relief as this Court may deem just and proper.

This 29th day of September, 2025.

Respectfully Submitted by,
BURROW & ASSOCIATES, LLC

/s/
Kevin Grindlay
Attorney for the Debtor
Georgia Bar No. 350009
2280 Satellite Blvd.
Bldg. A, Suite 100
Duluth, Georgia 30097
(678) 942-8640
bankruptcy@legalatlanta.com

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of September, 2025, I electronically filed the foregoing Objection to the Proof of Claim of US Department of Education/MOHELA and Notice of Objection to the Proof of Claim of US Department of Education/MOHELA, Deadline to Object and Hearing with the Clerk of Court using the Bankruptcy Court's Electronic Case Filing program, which automatically sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

K. Edward Safir
Michael F. Burrow

I further certify that on this day I caused a copy of this document to be served via United States First Class Mail, with adequate postage prepaid, on the following parties at the address shown for each.

Vaughnette Michelle Jones
804 Lincoln Crest Drive
Austell, GA 30106

US Department Of Education/MOHELA
Attn: Bankruptcy
633 Spirit Dr
Chesterfield, MO 63005

MOHELA
Attn: Nicole Guernsey, Loan Servicing Specialist
633 Spirit Drive
Chesterfield, MO 63005

Georgia Department of Education
205 Jesse Hill Jr. Drive, SE
Atlanta, GA 30334-5001

United States Attorney's Office
Richard B. Russell Federal Building
75 Ted Turner Dr. SW
Suite 600
Atlanta, GA 30303-3309

U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

ePawn
6362 Fairburn Rd
Douglasville, GA 30134

All parties on the attached mailing matrix.

This 29th day of September, 2025.

Respectfully Submitted by,
BURROW & ASSOCIATES, LLC

_____/s/
Kevin Grindlay
Attorney for the Debtor
Georgia Bar No. 350009
2280 Satellite Blvd.
Bldg. A, Suite 100
Duluth, Georgia 30097
(678) 942-8640
bankruptcy@legalatlanta.com

Label Matrix for local noticing
113E-1
Case 24-50770-pwb
Northern District of Georgia
Atlanta
Mon Sep 29 06:49:37 EDT 2025

Connie L. Beardsley
Unit 55
129 Holiday Rd
Buford, GA 30518-1658

Credit Central
700 E North St, Ste 15
Greenville, SC 29601-3013

First Investors Financial Dept
Attn: Bankruptcy
3065 Akers Mill Rd Se, Ste 700
Atlanta, GA 30339-3124

Georgia's Own Credit Union
c/o D. Tyler Van Leuven, Esq.
Post Office Box 3637
Tallahassee, FL 32315-3637

Hollis Cobb
6621 Bay Circle
Suite 180
Norcross, GA 30071-1218

(p)LENDMARK FINANCIAL SERVICES
2118 USHER ST
COVINGTON GA 30014-2434

Office of the United States Trustee
362 Richard Russell Building
75 Ted Turner Drive, SW
Atlanta, GA 30303-3315

Phenix Fin
2430 E. 8th Street
Odessa, TX 79761-4902

K. Edward Safir
Standing Chapter 13 Trustee
Suite 1600
285 Peachtree Center Ave. NE
Atlanta, GA 30303-1229

Aidvantage
Attn: Bankruptcy
Po Box 9635
Wiles-Barr, PA 18773-9635

Michael F. Burrow
Burrow & Associates, LLC
Building A, Suite 100
2280 Satellite Blvd.
Duluth, GA 30097-5000

Esusu/fcps
215 West 125th Street
New York, NY 10027-4426

Forest Glen Apartment
4236 Austell Rd
Austell, GA 30106-8239

Georgia's Own Credit Union
Post Office Box 3637
Tallahassee, FL 32315-3637

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

(p)MOHELA
CLAIMS DEPARTMENT
633 SPIRIT DRIVE
CHESTERFIELD MO 63005-1243

OneMain Financial
Attn: Bankruptcy
Po Box 3251
Evansville, IN 47731-3251

Quantum3 Group LLC as agent for
CASCADE CAPITAL FUNDING LLC
PO Box 788
Kirkland, WA 98083-0788

Robert D. Schwartz
Robert D. Schwartz
P O Box 160100
Atlanta, GA 30316-1002

Allen M Bearden
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Duluth, GA 30097-5000

Connie L. Beardsley
129 Holiday Rd.
Unit 55
Buford, GA 30518-1658

Robert J. Fehse
Evans Petree
Suite 800
1715 Aaron Brenner Drive
Memphis, TN 38120-1445

(p)GEORGIA DEPARTMENT OF REVENUE
BANKRUPTCY
2595 CENTURY PKWY NE SUITE 339
ATLANTA GA 30345-3173

Green Funds Group Green Funds Express
PO BOX 1427
Addison, IL 60101-8427

Vaughnette Michelle Jones
804 Lincoln Crest Drive
Austell, GA 30106-8227

Shweta Maheshwari
2600 Milscott Drive, Apt. 1330
Decatur, GA 30033-6025

Petland/Comenity Bank
Attn: Bankruptcy
Po Box 182125
Columbus, OH 43218-2125

Quantum3 Group LLC as agent for
Crown Asset Management LLC
PO Box 788
Kirkland, WA 98083-0788

H. Michael Solloa Jr.
Tripp Scott, P.A.
110 SE 6th Street
15th Floor
Fort Lauderdale, FL 33301-5004

Southeast Toyota Finance
260 Interstate North Cir., SE
Atlanta, GA 30339-2210

Springfield Fin
9365 The Landing Dr Ste E 400
Douglasville, GA 30135-7139

(p) SUNSET MANAGEMENT CO LLC
ATTN KRISTIN WILSON
510 MOUNTIAN VIEW DR
SUITE 500
SENECA SC 29672-2145

Sunset Finance Of CA
Attn: Bankruptcy
510 Mountain View Dr, Ste 500
Seneca, SC 29672-2145

(p) TRANSFORM CREDIT INC
1440 W TAYLOR ST
431
CHICAGO IL 60607-4623

United States Attorney
Northern District of Georgia
75 Ted Turner Drive SW, Suite 600
Atlanta GA 30303-3309

David Tyler Van Leuven
Sorenson Van Leuven, PLLC
PO Box 3637
Tallahassee, FL 32315-3637

Walters Management
Attn: Bankruptcy
Po Box 2935
Gainesville, GA 30503-2935

David S. Weidenbaum
Office of the U.S. Trustee
362 Richard B. Russell Bldg.
75 Ted Turner Drive, SW
Atlanta, GA 30303-3330

Wilkes Finance
999 Veterans Memorial Hwy SW
Mableton, GA 30126-3103

Wilkes Finance
Attn: Bankruptcy
8542 Hospital Drive
Douglasville, GA 30134-2413

Wilkes Finance Corp
Attn: Bankruptcy
6160 Fairburn Rd
Douglasville, GA 30134-1993

World Finance Corp
Attn: Bankruptcy
Po Box 6429
Greenville, SC 29606-6429

World Omni Financial Corp.
Attn: Bankruptcy
6150 Omni Park Drive
Mobile, AL 36609-5195

World Omni Financial Corp.
c/o H. Michael Solloa, Jr., Esq.
Tripp Scott, P.A.
110 SE 6th Street.
Fort Lauderdale. FL. 33301-5000

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Georgia Department of Revenue
Compliance Division
ARCS Bankruptcy
1800 Century Blvd. NE, Suite 9100
Atlanta, GA 30345-3202

Lendmark Financial Services
Attn: Bankruptcy
1735 North Brown Rd, Ste 300
Lawrenceville, OH 30043

MOHELA
Attn: Bankruptcy
633 Spirit Dr
Chesterfield, MO 63005

Sunset Finance Co., LLC.
Attn: Kristin Wilson
510 Mountain View Drive
Suite 500
Seneca, SC 29672

Transform Credit Inc
1440 W TAYLOR ST
PMB 431
CHICAGO, IL 60607

(d) Transform Credit Inc
Attn: Bankruptcy
332 S Michigan Ave, 9th Floor
Chicago, IL 60604

(d) US Department of Education/MOHELA
633 Spirit Drive
Chesterfield, MO 63005

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Shweta Maheshwari

(u)Transform Credit Inc.

(u)World Omni Financial Corp.

2600 Milscott Drive, Apt 1330

Decatur, GA 30033-6025

End of Label Matrix

Mailable recipients 44

Bypassed recipients 3

Total 47